

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION REGARDING PENSION BENEFIT GUARANTY
CORPORATION'S MOTION FOR LEAVE TO FILE ADDITIONAL BRIEFING**

The undersigned counsel for the Pension Benefit Guaranty Corporation (the “PBGC”), hereby certifies as follows:

1. On August 12, 2024, PBGC filed its *Motion for Leave to File Limited Additional Briefing* (the “Motion”) [D.I. 4079].
2. On August 16, 2024, the Debtors filed their *Response to the Post-Hearing Submissions Filed by the SFA MEPPs and PBGC in Support of Debtors’ Motion for Partial Summary Judgment on SFA MEPPs’ Withdrawal Liability Claims* (the “Debtors’ Response”) [D.I. 4104]. The Debtors indicate in the Debtors’ Response that they do not object to the PBGC’s request for leave to file a post-hearing submission. The Debtors’ Response includes a discussion of the points raised in PBGC’s proposed post-hearing submission.
3. Also on August 16, 2024, MFN Partners, LP (“MFN”) filed its *Response to the Post-Hearing Submissions Filed by the SFA MEPPs and PBGC in Support of Debtors’ Motion for Partial Summary Judgment on SFA MEPPs’ Withdrawal Liability Claims* (the “MFN Response”) [D.I. 4108]. MFN indicated in the MFN Response that it does not object to the PBGC’s request for leave to file a post-hearing submission. MFN’s Response includes a discussion of the points raised in PBGC’s proposed post-hearing submission.

4. PBGC has received no additional answer, objection, or other responsive pleading to its Motion, and no other answer, objection, or other responsive pleading to its Motion has appeared on the court's docket.

WHEREFORE, PBGC respectfully requests that this Honorable Court enter the Proposed Order attached to the Motion, permitting PBGC's proposed post-hearing submission to be considered by the Court and included in the record in this contested matter.

Respectfully submitted,

/s/ Andrew Philip Walker

August 26, 2024
Washington, D.C.

Karen L. Morris, *General Counsel*
Daniel Liebman, *Deputy General Counsel*
Kartar S. Khalsa, *Deputy General Counsel*
John H. Ginsberg, *Ass't General Counsel*
Stephanie Thomas, *Ass't General Counsel*
Benjamin T. Kelly, *Deputy Ass't General Counsel*
Emily J. Allender, *Attorney*
Andrew Philip Walker, *Attorney*
Desiree M. Amador, *Attorney*
Rebecca Stark, *Attorney*

Pension Benefit Guaranty Corporation
445 12th Street SW
Washington, D.C. 20024-2101
Telephone: (202) 321-1588
Walker.andrew@pbgc.gov & efile@pbgc.gov